



# STATE OF IDAHO

DEPARTMENT OF HEALTH  
AND WELFARE

DIVISION OF ENVIRONMENT  
Statehouse  
Boise, Idaho 83720

September 5, 1984

MEMORANDUM

TO: Mark Masarik  
FROM: Steve Provant  
SUBJECT: Zilog, Inc. RCRA Inspection

On June 28, 1984, Steve Rose, Southwest District Health Department, inspected Zilog, Inc. A copy of the inspection report is attached. A number of areas of non-compliance with RCRA was noted during the inspection.

1. 40 CFR 265.174 requires that owners or operators of hazardous waste generating facilities must make at least weekly inspections of container storage areas. Mr. Rose noted that Zilog did not have records documenting that weekly inspections had been made.
2. 40 CFR 265.194 requires that the owner or operator of a tank storing hazardous waste must inspect discharge control equipment, data gathered from monitoring equipment, the level of waste in the tank at least daily and the construction materials of the tank and the area immediately surrounding discharge confinement structures at least weekly. Mr. Rose noted that Zilog did not have records documenting that daily and weekly inspections had been made.
3. 40 CFR 265.198(b) requires that ignitable wastes stored in tanks must comply with the buffer zone requirements and have properly posted "No Smoking" signs. Zilog was not meeting the requirements by having "No Smoking" signs posted.
4. 40 CFR 265.16(d)(3) requires that the owner or operator of a hazardous facility must maintain documents at the facility describing the type and amount of introductory and continuing training that will be given to each person filling a hazardous waste position at the facility. Zilog did not provide documentation on the amount of training given to employees.

USEPA SF



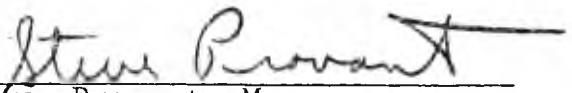
1643300

EQUAL OPPORTUNITY EMPLOYER

MEMORANDUM - Zilog Inc. RCRA Inspection  
Mark Masarik  
September 5, 1984  
Page Two

5. During the course of the inspection, Mr. Rose reviewed hazardous waste shipping manifests for hazardous wastes shipped from Zilog. This inspection revealed that Zilog is in violation of the following requirements of 40 CFR Part 262, Subpart B promulgated by EPA pursuant to RCRA and 49 CFR 172 as promulgated by DOT pursuant to PL 89-670:
- a. 40 CFR 262.21(a)(5) requires that the manifests contain the proper shipping name. Manifest Document Numbers CWS-21, CWS-22 and CWS-23 did not contain the proper shipping name as specified in 49 CFR 172.101(c)(10).
  - b. 40 CFR 262.21(a)(6) requires that manifests contain the total quantity of hazardous waste by units of weight or volume and the type of containers. Manifest Document Number CWS-22 did not give the type of container or the units of weight or volume.

I recommend that EPA send a Notice of Violation and Warning letter to Zilog for the above documented RCRA violations.

  
Steve Provant, Manager  
Solid and Hazardous Waste Section

SP/jd

Attachment